

THE HONORABLE BENJAMIN H. SETTLE

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

DiscoverOrg, LLC,

Plaintiff,

v.

APIHub, Inc. d/b/a Clearbit,

Defendant.

Case No. 3:17-cv-05941-BHS

**STIPULATED MOTION AND
ORDER TO EXTEND
RESPONSE DEADLINES RELATED
TO MOTION TO DISMISS**

NOTED FOR CONSIDERATION
DECEMBER 26, 2017

**STIPULATED MOTION TO EXTEND RESPONSE DEADLINES RELATED TO
MOTION TO DISMISS**

Plaintiff DiscoverOrg, LLC and Defendant APIHub, Inc. d/b/a Clearbit hereby submit the following Stipulated Motion to Extend the Response Deadlines Related to the Motion to Dismiss. Specifically, the parties agree to extend the deadlines to file the response to Clearbit's Motion to Dismiss for Lack of Personal Jurisdiction (Dkt. # 11) from January 8, 2018 to February 5, 2018. The parties further agree to extend the deadline to file the reply in support of the Motion to Dismiss from January 12, 2018 to February 9, 2018.

The parties agree that these extensions are necessary to allow them to engage in meaningful settlement discussions. The parties believe that the extensions will benefit the parties and the court by allowing the parties to focus on resolution and avoid unnecessary briefing expenses as well as expenditures of judicial resources. The parties do not believe that the extensions will prejudice either party or further affect the overall case schedule.

STIPULATION AND PROPOSED ORDER RE
EXTENSION OF TIME - 1
Case No. 3:17-cv-05941-BHS

710004.0033/7165445.1

LANE POWELL PC
1420 FIFTH AVENUE, SUITE 4200
SEATTLE, WASHINGTON 98101-9402
206-223-7000 FAX: 206-223-7107

1 Therefore, the parties respectfully request that this Court enter an order extending the
2 briefing deadlines.

3
4 Respectfully submitted,

5 DATED: December 26, 2017

s/ Benjamin Stone
Benjamin J. Stone, WSBA No. 33436
Attorneys for Defendant APIHub, Inc. d/b/a Clearbit

Lewis Brisbois Bisgaard & Smith LLP
1111 Third Avenue, Suite 2700
Seattle, Washington 98101
Email: Benjamin.stone@lewisbrisbois.com

9
10 DATED: December 26, 2017

s/ Tiffany Scott Connors
Parna A. Mehrbani, WSBA No. 41631
Tiffany Scott Connors, WSBA No. 41740
Attorneys for Plaintiff DiscoverOrg, LLC

12 Lane Powell PC
1420 Fifth Avenue, Suite 4200
13 Seattle, WA 98111-9402
14 Phone: 206-223-7000
15 Fax: 206-223-7107
16 Email: mehrbani@lanepowell.com
connorst@lanepowell.com

17
18
19
20
21
22
23
24
25
26
27
STIPULATION AND PROPOSED ORDER RE
EXTENSION OF TIME - 2
Case No. 3:17-cv-05941-BHS

710004.0033/7165445.1

LANE POWELL PC
1420 FIFTH AVENUE, SUITE 4200
SEATTLE, WASHINGTON 98101-9402
206-223-7000 FAX: 206-223-7107

ORDER

IT IS SO ORDERED.

DATED: 2 January 2018



Honorable Benjamin H. Settle

STIPULATION AND PROPOSED ORDER RE
EXTENSION OF TIME - 3
Case No. 3:17-cv-05941-BHS

710004.0033/7165445.1

LANE POWELL PC
1420 FIFTH AVENUE, SUITE 4200
SEATTLE, WASHINGTON 98101-9402
206-223-7000 FAX: 206-223-7107